

## **REMARKS**

In response to the above-identified Office Action, Applicants amend the application and seek reconsideration thereof. In this response, Applicants amend Claim 16. Applicants do not cancel or add any claims. Accordingly, Claims 1-22 are pending.

### **I. Claims Rejected Under 35 U.S.C. § 102(b)**

The Examiner rejects Claims 1, 2, and 5-7 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,825,921 to Dulong ("Dulong"). Applicants respectfully traverse the rejection.

To anticipate a claim, the Examiner must show that a single reference teaches each of the elements of that claim. Among other limitations, Claim 1 recites the elements of "a display controller" and "a control circuitry." Applicants respectfully submit that Dulong does not teach at least these elements.

The Examiner characterizes Dulong's memory controller as the display controller recited in Claim 1. The memory controller taught by Dulong controls memory transfers between a pattern recognition (PR) engine and an off-chip private memory via a dedicated bus (col. 14, lines 24-26 and lines 40-45). The memory controller performs memory access arbitration for memory access requests between the elements of the PR engine and the private memory (col. 14, lines 40-50). Throughout the disclosure of Dulong, there is nothing that indicates the memory controller performing any operations in connection with display functions. The memory controller does not control or become involved in the control of a display. Thus, the memory controller taught by Dulong cannot anticipate the display controller. Thus, Dulong fails to teach each of the elements of Claim 1.

Furthermore, Dulong fails to teach "a control circuitry to copy display data from an external frame buffer to the internal frame buffer, wherein the display data copied into the internal frame buffer is the same display data read by the display controller from the external frame buffer," as recited in Claim 1. The Examiner characterizes Dulong's memory to memory transfer block as the control circuitry. However, Dulong's memory to memory transfer block does not copy data; rather, it controls data transfer. Dulong specifically teaches that the channels of the memory to memory

control block control data transfer from the off-chip memory to the on-chip memory (col. 14, lines 63-65). After the data transfer, the data resides in both the off-chip memory and the on-chip memory. In contrast, the display data of Claim 1 read by the display controller is copied by the control circuitry. In addition to the display data in the external frame buffer and the same display data read by the display controller for displaying, there is a copied data in the internal frame buffer. Dulong does not teach such data copying. Thus, Dulong fails to teach each of the elements of Claim 1. Accordingly, Applicants respectfully request withdrawal of the anticipation rejection of independent Claim 1.

Claims 2, and 5-7 depend from Claim 1 and incorporate the limitations thereof. Therefore, at least for the same reasons mentioned above in regard to Claim 1, Dulong does not anticipate Claims 2, and 5-7. Accordingly, Applicants respectfully request withdrawal of the anticipation rejection of independent Claims 2, 5, and 7.

## **II. Claims Rejected Under 35 U.S.C 103(a)**

Claims 3, 4, 9-11, 13, 16, 17, and 19-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dulong in view of U.S. Pre-Grant Patent Application No. 2003/0227460 applied for by Schinnerer ("Schinnerer"). Applicants respectfully disagree for the following reasons.

To establish a *prima facie* case of obviousness, the Examiner must show the cited references, combined, teach or suggest each of the elements of a claim. In regard to Claims 3 and 4, these Claims depend from Claim 1 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claim 1, Dulong does not teach or suggest the display controller and the control circuitry recited in Claim 1. Schinnerer does not cure these defects of Dulong. Schinnerer teaches a double buffering technique for synchronizing video data streams (Abstract). However, Schinnerer does not teach or suggest a display controller that reads display data from an external frame buffer. Schinnerer also does not teach or suggest a control circuit that copies display data. Thus, Dulong in view of Schinnerer does not teach or suggest each of the

elements of Claim 1 or its dependent Claims 3 and 4. Accordingly, Dulong in view of Schinnerer does not render Claims 3 and 4 obvious.

Further, the Examiner has improperly combined Schinnerer with Dulong. To modify or combine references, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See MPEP 2143.01. Dulong teaches a memory controller which performs functions entirely unrelated to a display. Thus, there is no motivation either implicitly or explicitly disclosed within Dulong to use the memory controller as a display controller for practicing the technique taught by Schinnerer. Thus, Dulong and Schinnerer cannot be combined to teach or suggest each of the elements of Claim 1 and its dependent Claims 3 and 4. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claims 3 and 4 are requested.

In regard to Claim 9, among other elements, Claim 9 recites a graphics chip including a display controller and data copy circuitry. Applicants respectfully submits at least for the reasons mentioned in regard to Claims 1, 3, and 4, Dulong in view of Schinnerer does not teach or suggest the elements of a display controller and data copy circuitry. Further, neither Dulong nor Schinnerer teaches or suggests using a graphics chip for these elements. Thus, Dulong in view of Schinnerer does not render Claim 9 obvious.

The Examiner also has improperly combined Schinnerer with Dulong in the rejection of Claim 9. Applicants respectfully submit that at least for the reasons mentioned above in regard to Claims 3 and 4, Dulong and Schinnerer cannot be combined. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claim 9 are requested.

Claims 10, 11, and 13 depend from independent Claim 9 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claim 9, Dulong in view of Schinnerer does not render Claims 10, 11, and 13 obvious. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claims 10, 11, and 13 are requested.

In regard to independent Claim 16, Applicants have amended the language of Claim 16 to more clearly point out the copy operation. Claim 16 includes the elements of "a display controller"

and "a copy of the display data," which refer to the elements similarly recited in Claim 1. Thus, at least for the reasons mentioned in regard to Claims 1, 3, and 4, Dulong in view of Schinnerer does not render Claim 16 obvious.

The Examiner has also improperly combined Schinnerer with Dulong in the rejection of Claim 16. Applicants respectfully submit that at least for the reasons mentioned above in regard to Claims 3 and 4, Dulong in view of Schinnerer cannot be combined. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claim 16 are requested.

Claims 17, 19-22 depend from independent Claim 16 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claim 16, Dulong in view of Schinnerer does not render Claims 17, and 19-22 obvious. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claims 17, and 19-22 are requested.

Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Dulong in view of U.S. Patent No. 6,118,486A issued to Reitmeier ("Reitmeier").

The Examiner admits that Dulong does not teach the memory clock signal recited in Claim 8, but relies on Reitmeier to cure the defect. Reitmeier teaches a video signal processing system that produces synchronized video and timing signals (Abstract). There is nothing in Reitmeier that teaches or suggests the display controller or the control circuitry as recited in Claim 1. Thus, neither Dulong nor Reitmeier, separately or in combination, teaches or suggests each of the elements of Claim 1. As Claim 8 depends from Claim 1 and incorporates the limitations thereof, Dulong in view of Reitmeier does not teach or suggest each of the elements of Claim 8.

Further, Applicants submit that the Examiner has improperly combined Reitmeier with Dulong for similar reasons mentioned in regard to Claims 3 and 4. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claim 8 are requested.

Claims 12, 15, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dulong in view of Schinnerer, and further in view of U.S. Pre-Grant Patent Application No. 2004/10150647A1 applied for by Aleksic, et al. ("Aleksic").

Aleksic discloses a system for processing graphics to be displayed in a portable device (Abstract). There is nothing in Aleksic that teaches or suggests the display controller, the data copy circuitry, or a copy of the display data as recited in Claims 9 and 16. Thus, Dulong in view of Reitmeier, and further in view of Aleksic does not teach or suggest each of the elements of Claims 9 and 16. Claims 12 and 15 depend from Claim 9, and Claim 18 depends from Claim 16. These dependent Claims incorporate the limitations of their respective base Claims. Thus, at least for the reasons mentioned in regard to Claims 9 and 16, the above cited references, separately or combined, do not teach or suggest each of the elements of Claims 12, 15, and 18.

Further, Applicants submit that the Examiner has improperly combined Aleksic with Dulong for similar reasons mentioned in regard to Claims 3 and 4. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claims 12, 15, and 18 are requested.

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Dulong in view of Schinnerer, and further in view of Reitmeier. The Examiner states that Claim 14 is rejected under the same rationale that Claim 8 is rejected. Claim 14 depends from Claim 9 and incorporates the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claims 8 and 9, Dulong, Schinnerer, and Reitmeier, separately or combined, do not teach or suggest each of the elements of Claim 14. Accordingly, reconsideration and withdrawal of the obviousness rejection of Claim 14 are requested.

### CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-22 patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

Respectfully submitted,

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#### CERTIFICATE OF MAILING:

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on April 25, 2005.

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